

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN RE WORLD TRADE CENTER DISASTER : 21 MC 100 (AKH)  
SITE LITIGATION : (All Cases)  
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IN RE COMBINED WORLD TRADE CENTER : 21 MC 103 (AKH)  
AND LOWER MANHATTAN DISASTER SITE : (All Cases)  
LITIGATION (straddler plaintiffs) :  
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**DECLARATION IN SUPPORT OF JOINT MOTION TO  
DISMISS CLAIMS AGAINST THE PORT AUTHORITY OF  
NEW YORK AND NEW JERSEY**

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CHRISTOPHER R. LOPALO, an attorney duly licensed to practice before the Courts of the State of New York and admitted to the bar of this Honorable Court, hereby declares under penalty of perjury:

1. I am associated with Worby Groner Edelman & Napoli Bern, LLP (“WGENB”), Plaintiffs’ Co-Liaison Counsel, and submit this Declaration in support of the Joint Motion to Dismiss Claims Against The Port Authority of New York and New Jersey (“Port Authority”).
2. On October 14, 2010, the Court approved the Plaintiffs’ settlement with the Port Authority. *See* Order Regulating Proceedings dated October 14, 2010 attached hereto as Exhibit “1”.
3. Pursuant to this Court’s Orders dated January 3, 2011 and March 21, 2011 regarding protocols for dismissals, Plaintiffs and the Port Authority submit this stipulation of dismissal with prejudice of certain plaintiffs’ claims against the Port Authority, attached hereto as Exhibit “2”.
4. These plaintiffs have elected to opt-in to the settlement with the Port Authority, and are required to dismiss their claims with prejudice pursuant to that settlement.

5. Accordingly, the plaintiffs respectfully request that this Court “So Order” the stipulation of dismissal with prejudice.

6. The Port Authority joins in this request.

Dated: New York, New York  
May 12, 2011

/s/ Christopher R. LoPalo  
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